

1 J Christopher Jorgensen  
Nevada Bar No. 5382  
2 Matthew R. Tsai  
Nevada Bar No. 14290  
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway, Suite 600  
4 Las Vegas, NV 89169  
Phone: (702) 949-8200  
5 Fax: (702) 949-8398  
Email: cjorgensen@lrrc.com  
6 Email: mtsai@lrrc.com

7 *Attorneys for Defendant Barclays Bank of Delaware*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 MATTHEW NELSON,

11 Plaintiff,

12 vs.

13 RAUSCH, STURM, ISRAEL, EMERSON &  
14 HORNIK, LLP, BARCLAYS BANK OF  
DELAWARE, EXPERIAN INFORMATION  
15 SOLUTIONS, INC., EQUIFAX  
INFORMATION SERVICES, INC., and  
TRANSUNION, LLC

16 Defendants.

Case No. 2:19-cv-01792-APG-EJY

**JOINT MOTION AND ORDER FOR  
EXTENSION OF TIME FOR DEFENDANT  
BARCLAYS BANK OF DELAWARE TO  
RESPOND TO COMPLAINT**

**[SECOND REQUEST]**

17  
18 COME NOW Defendant Barclays Bank of Delaware (“Barclays”), and Plaintiff Matthew  
19 Nelson (“Plaintiff”), by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension as  
20 follows:

21 **STATEMENT OF JOINT MOTION**

22 1. The Complaint in this action was filed on October 15, 2019 in the United States  
23 District Court for the District of Nevada captioned *Nelson v. Rausch*, Case No. 2:19-cv-01792-APG-  
24 EJY.

25 2. Barclays’ response to the Complaint was initially due on November 12, 2019.

26 4. At that time, Barclays had recently retained counsel in the above-captioned lawsuit  
27 and was in the process of reviewing the claims in Plaintiff’s Complaint and was gathering documents,  
28 which required additional time.

1           5.       On November 1, 2019, Barclays filed an Emergency Motion for Extension of Time  
2 for Defendant Barclays Bank of Delaware to Answer or Otherwise Respond to Complaint (“Motion”)  
3 (ECF No. 8), and this Court granted Barclays’ Motion (the “First Request”), extending the time within  
4 which Barclays was to respond to the Complaint until December 12, 2019. (ECF No. 15).

5           6.       Barclays’ time to respond to the Complaint has not yet expired.

6           7.       Good cause exists to extend Barclays’ deadline to respond to the Complaint by an  
7 additional 28 days. Barclays recently received a settlement demand from Plaintiff which is currently  
8 under consideration by Barclays. In addition, counsel for Barclays and counsel for Plaintiff have  
9 agreed to exchange documentation in order to further discussions on whether a resolution can be  
10 reached without the need for costly litigation.

11          8.       Counsel for Plaintiff and Counsel for Barclays have conferred and agreed to extend  
12 the deadline in which Defendant has to answer or otherwise respond to Plaintiffs’ Complaint by an  
13 additional twenty-eight (28) days, through and until January 9, 2020.

14          9.       This joint motion is filed in good faith and not intended to cause delay and will not  
15 prejudice any other party to the case.

16          10.      This is the second request for extension of time for Barclays to respond to the  
17 Complaint.

18 DATED: December 11, 2019

DATED: December 11, 2019

19 LEWIS ROCA ROTHERGER CHRISTIE

THE LAW OFFICE OF VERNON NELSON

20 /s/ Matthew R. Tsai  
21 J Christopher Jorgensen (NV Bar #5382)  
22 Matthew R. Tsai (NV Bar #14290)  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169

/s/ Vernon A. Nelson  
Vernon A. Nelson (NV Bar #6434)  
6787 W. Tropicana Avenue, Suite 103  
Las Vegas, NV 89103

*Counsel for Defendant Barclays Bank of Delaware*

*Counsel for Plaintiff Matthew Nelson*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: December 12, 2019